

From: Steven Craddock <scraddock@blm.gov>  
Sent: Friday, April 10, 2015 11:17 AM  
To: Closson, Dee A -FS  
Cc: Hesch, Patricia -FS  
Subject: RE: HOLD THE BUS on the CE/CX

My idea for a substitute "recommendation memo" crashed and burned, so there is no alternative to a formal NEPA document.

However, in the process of vetting my idea, I learned that FS does not have a CE similar to BLM's CX E-3 that covers a withdrawal revocation action -- so the shoe is back on our foot. I'll get it done as soon as I can.

Respectfully,

Steve Craddock  
Land Tenure Program Lead  
Colorado State Office - BLM  
PH: 303-239-3707

From: Steven Craddock [mailto:scraddock@blm.gov]  
Sent: Thursday, April 09, 2015 6:09 PM  
To: 'Closson, Dee A -FS'  
Cc: 'Hesch, Patricia -FS'  
Subject: HOLD THE BUS on the CE/CX

Before you start a CE/CX, let me call Mike to see if there is an alternative.

We may be able to substitute a Recommendation memo that takes the place of a FONSI/DR or CE/CX, especially since the FONSI/DR would probably be available prior to the time the PLO actually reaches the Assistant Secretary for execution.

I'll do my best to have an answer back to you in the morning. I'm writing a message to Mike right now and will send it before I go home tonight.

Respectfully,

Steve Craddock  
Land Tenure Program Lead  
Colorado State Office - BLM  
PH: 303-239-3707

From: Steven Craddock [mailto:scraddock@blm.gov]  
Sent: Thursday, April 09, 2015 5:44 PM  
To: 'Closson, Dee A -FS'  
Cc: 'Hesch, Patricia -FS'  
Subject: RE: Need for NEPA completion - CE/CX

Yes. The package needs to include a NEPA document concluding that no significant environmental issues are associated with the proposed Partial Revocation of the Withdrawal.

Remember, the decision needs to be limited to that statement. It is not a decision "approving" the partial revocation. That is a Secretarial-level action effected by her (or her designee) signing the PLO.

Respectfully,

Steve Craddock  
Land Tenure Program Lead  
Colorado State Office - BLM  
PH: 303-239-3707

From: Closson, Dee A -FS [mailto:daclosson@fs.fed.us]  
Sent: Thursday, April 09, 2015 4:46 PM  
To: Steven Craddock  
Cc: Hesch, Patricia -FS  
Subject: RE: Need for NEPA completion - CE/CX

Does the CE/CX need to be included in the withdrawal package to the WO?

From: Steven Craddock [mailto:scraddock@blm.gov]  
Sent: Thursday, April 09, 2015 3:35 PM  
To: Closson, Dee A -FS  
Cc: Hesch, Patricia -FS  
Subject: Need for NEPA completion - CE/CX

Dee,

Per our discussion late yesterday, I thought we (BLM) could conduct the CX for the Partial Revocation either here in the State Office or at the Field Office. I've since discovered that will not be possible under current workload priorities, especially in the time frame that the CE/CX is needed. So, I regret to inform you that the CE/CX will need to be performed and provided by the Forest Service.

The BLM NEPA Handbook (H-1790-1) provides an exclusion for this action at Appendix 4, #E-3, which states:

Withdrawal revocations, terminations, extensions, or modifications ... where the land would be opened only to discretionary land laws and where subsequent discretionary actions (prior to implementation) are in conformance with and are covered by a Resource Management Plan/EIS (or plan amendment and EAQ or EIS).

Hopefully the FS NEPA Handbook contains a similar CE/CX.

Let me know.

Respectfully,

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